

# **EXHIBIT A**

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ADMITTED IN NY & CA

STUART GOLD

March 5, 2021

VIA EMAIL

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U.S. Department of Justice

Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Counsel:

We write to request, pursuant to Federal Rules of Criminal Procedure 16(a)(1)(B)(i) & (E)(i), any data, documents, or objects in the government's possession, custody, or control relating to [REDACTED] Tim Leissner. This letter is to follow up on our January 8,

**BRAFMAN & ASSOCIATES, P.C.**

2021 letter requesting electronic devices belonging to or used by Leissner, [REDACTED]  
[REDACTED] (See Exhibit 1.) We have also discussed this matter with you via telephone.

Since our January letter and phone call, we have not heard any follow up from the government. To be more precise in our request, we specifically point you to DOJ- [REDACTED] an email [REDACTED]:

[REDACTED]

(Exhibit 2: DOJ-0 [REDACTED]) As stated in our January letter, [REDACTED]

[REDACTED] he government has actual or constructive possession over these devices. To be even more precise, we believe that the government is fully aware that Goldman Sachs is currently in possession of the phones that Mr. Leissner used while at Goldman and that the phones contain communications directly relevant to this case. We further believe that the government knows exactly where the phones are, and that the government is able to possess and access the phones.

We hereby request that the government provide all these materials immediately as they fall within the parameters of Rule 16. Thank you for your prompt attention to this matter.

Respectfully,



Marc A. Agnifilo, Esq., *Of Counsel*  
Zach Intrater, Esq., *Of Counsel*  
Teny R. Geragos, Esq.  
Jacob Kaplan, Esq.

## **EXHIBIT 1**

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January 8, 2021

VIA EMAIL

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Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Counsel:

We write to request, pursuant to Federal Rules of Criminal Procedure 16(a)(1)(E)(i), any data, documents, or objects in the Government's possession, custody, or control relating to [REDACTED] Tim Leissner.

[REDACTED]

We have reason to know that the Government has constructive possession and control over numerous electronic devices belonging to or used by Leissner, [REDACTED]  
[REDACTED]

We hereby request that the Government provide all these materials immediately as they fall within the parameters of Rule 16. Thank you for your prompt attention to this matter.

Respectfully,



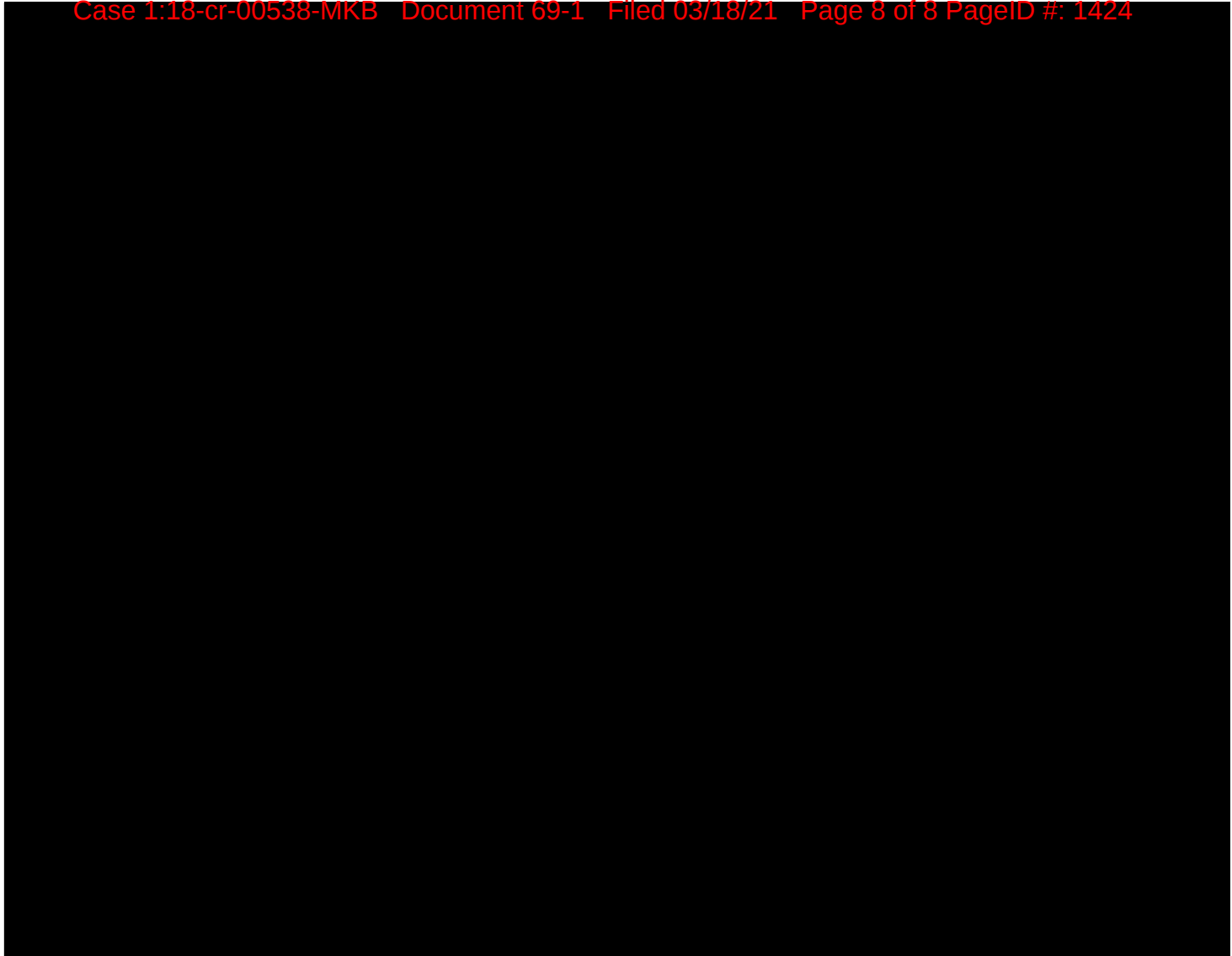
Marc A. Agnifilo, Esq., *Of Counsel*

Zach Intrater, Esq., *Of Counsel*

Teny R. Geragos, Esq.

Jacob Kaplan, Esq.

## **EXHIBIT 2**



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